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UNITED STATES OF AMERICA,

v.

\$95,999.00 UNITED STATES CURRENCY,

Defendant.

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23 MC 6004-EAW  
~~23 CV~~

**STIPULATION TO EXTEND PLAINTIFF'S TIME TO  
FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

IT IS HEREBY STIPULATED and agreed upon between and among the United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Melanie J. Bailey, Assistant United States Attorney, of counsel, and Michael Schiano, Esq., for Marcus McFadden (hereinafter "the claimant"), that pursuant to Title 18, United States Code, Section 983(a)(3)(A), the government's time to file a Verified Complaint for Forfeiture against \$95,999.00 United States Currency (hereinafter "the subject funds") is extended from April 18, 2023 to July 18, 2023.

The parties to this Stipulation further agree that the claimant may revoke his consent in writing to extend the time for the government to file its Verified Complaint for Forfeiture against the subject funds, and in that event, the government shall then have ten (10) days from the date the government received notice of such action to file its Verified Complaint for Forfeiture.

TRINI E. ROSS  
United States Attorney

Dated: 4/13/2023

By: Melanie J. Bailey  
MELANIE J. BAILEY  
Assistant United States Attorney

Dated: 4/13/2023

  
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MICHAEL SCHIANO, ESQ.  
Attorney for Claimant

Dated: 4/13/2023

  
\_\_\_\_\_  
MARCUS MCFADDEN  
Claimant

**SO ORDERED.**

**DATE:** \_\_\_\_\_, 2023  
Buffalo, New York

**ENTER:**

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HON.  
UNITED STATES DISTRICT JUDGE